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10 **UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

11 ROGER PALMER, *et al.*,

12 Plaintiffs,

13 v.

14 STEPHEN SISOLAK, in his official
capacity as Governor of Nevada, *et al.*,

15 Defendants.

16 Case No.: 3:21-cv-00268

17 **JOINT STATUS REPORT
CONCERNING HEARING ON
PLAINTIFFS' MOTION FOR
PRELIMINARY INJUNCTION**

18 **Judge: Hon. Miranda Du
Date: July 16, 2021
Time: 1:30 p.m.
Courtroom: 5**

19 Plaintiffs Roger Palmer, Chad Moxley, and Firearms Policy Coalition, and Defendants
20 Stephen Sisolak, Aaron Ford, George Tigliatti, Mindy McKay, Joseph Lombardo, Steven Wolfson,
21 Daniel Coverley, and Mark Jackson (collectively the "Parties") hereby submit this Joint Status
22 Report concerning the above-referenced hearing on Plaintiffs' Motion for Preliminary Injunction.

23 The Parties have met, conferred, and reached the following stipulations and understandings:
24 None of the Parties will be introducing witness testimony.

25 Plaintiffs have proffered the exhibits filed with their Designation of Exhibits (Dkt. No. 41),
26 specifically, Declaration of Brandon Combs (Ex. 1; Dkt. No. 41-1), Declaration of Chad Moxley
27 (Ex. 2; Dkt. No. 41-2), Declaration of Roger Palmer (Ex. 3; Dkt. No. 41-3), Declaration of Joseph
28 Greenlee (Ex. 4; Dkt. No. 41-4), and Declaration of Joseph Ostini (Ex. 5; Dkt. No. 41-5). Defendants

1 do not intend to proffer separate exhibits of their own for purposes of the hearing. State Defendants
2 (Sisolak, Ford, Tigliatti, and McKay) request that this Court take judicial notice of the legislative
3 history of AB 286 and State Defendants' citation to various sections of the Federal Register and
4 federal legislative history. *See* FRE 201; *see also Territory of Alaska v. Am. Can Co.*, 358 U.S. 224,
5 227 (1959) (taking judicial notice of an act's legislative history).

6 The Parties have stipulated to the admissibility of Exhibits 1, 2, and 3, and to the
7 admissibility of the legislative history of AB 286, reserving the right to dispute the weight or
8 significance of the evidence. They have not stipulated to the admissibility of Exhibit 4 or 5, nor have
9 they stipulated to the admissibility of State Defendants' "citation to various sections of the Federal
10 Register and federal legislative history." Additionally, while Plaintiffs stipulate to judicial notice of
11 the legislative history of AB 286, they object to State Defendants' request for judicial notice of the
12 referenced sections of the Federal Register and federal legislative history as improper.

13 The Parties have not stipulated to the existence of any undisputed material facts for purposes
14 of the hearing.

15 Dated: July 13, 2021

16 THE O'MARA LAW FIRM, P.C.

THE DIGUISEPPE LAW FIRM, P.C.

17 /s/ David C. O'Mara

/s/ Raymond M. DiGuisepppe

18 David C. O'Mara, Esq.

Raymond M. DiGuisepppe, Esq.

19

20 FIREARMS POLICY COALITION

21 /s/ Adam Kraut

Adam Kraut, Esq.

22 William Sack, Esq.

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25 By: /s/ Steve Shevorski

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4 MARK B. JACKSON
5 Douglas County District Attorney
6 By: /s/ Zachary Wadle
7 Zachary Wadle, Esq. (Bar No. 8711)
8 *Attorneys for Defendants*
9 *Daniel Coverley, Sheriff of Douglas County, Nevada*
10 *Mark Jackson, District Attorney of Douglas County, Nevada*

11 **CERTIFICATE OF SERVICE**

12 I hereby certify that I am an employee of The O'Mara Law Firm, P.C. and on this date, the
13 foregoing document was filed electronically *via* the Court's ECF system which provided notification
14 of such filing to counsel of record for all parties.

15 Dated: July 13, 2021

16 /s/ Bryan Snyder
BRYAN SNYDER

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